Case 4:14-cv-00903-A Document 132 Filed 03/28/16 Page 1 of 4 PageID 6952 U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS THLED IN THE UNITED STATES DISTRICT COURT MAR 2 8 2016 NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION CLERK, U.S. DISTRICT COURT DIGITAL RECOGNITION NETWORK, Deputy INC., S S Plaintiff, S § VS. S NO. 4:14-CV-903-A ACCURATE ADJUSTMENTS, INC., § ET AL., § § Defendants.

## FINAL JUDGMENT

Consistent with the Agreed Order Granting Permanent
Injunction and Stipulated Dismissal signed on the date of the
signing of this final judgment,

The court ORDERS, ADJUDGES, and DECREES that Defendants

Accurate Adjustments, Inc. ("Accurate"), After Hours Auto

Recovery, Coastline Recovery Services, Inc., and Solid Solutions

24/7, Inc., as well as their principals Shane Freitas, Wes

Englebrecht and Scott Fornaro, their agents, servants, employees, independent contractors, attorneys, representatives, and those persons or entities directly or indirectly in active concert, communication or participation with them who receive actual notice of this Final Judgment, by personal service or otherwise,

jointly or severally, are commanded forthwith to desist and refrain, from:

- 1. Copying, duplicating, storing, sharing, distributing or selling any license plate recognition scan data ("LPR Data") that was (a) generated by or for DRN or Vigilant, (b) created or captured with DRN or Vigilant equipment or software, or (c) obtained from DRN or Vigilant ("DRN LPR Data"), provided that nothing herein shall prevent the enjoined parties from transmitting LPR Data to DRN in the ordinary course of business pursuant to a valid agreement with DRN;
- 2. Accessing, copying, duplicating, storing, sharing, distributing or selling any portion of the list of authorized orders or instructions to repossess a vehicle that are aggregated by DRN from various lenders and LPR Providers and managed within the DRN System (the "DRN Hotlist");
- 3. Using, maintaining or installing any unlicensed copies of DRN or Vigilant Car Detector software;
- 4. Copying, accessing or using the schema for the MySQL database that is created by the Car Detector software;

or

5. Creating, maintaining or using any software or device to (a) copy, duplicate, store, share or distribute DRN LPR Data or the DRN Hotlist, or (b) copy, access or use the MySQL database that is created by the Car Detector software.

THE COURT FURTHER ORDERS, ADJUDGES, AND DECREES that

Defendant Accurate and its principal Shane Freitas, as well as
their agents, servants, employees, independent contractors,
attorneys, representatives, and those persons or entities
directly or indirectly in active concert, communication or
participation with them who receive actual notice of this Final
Judgment, by personal service or otherwise, jointly or severally,
are commanded forthwith to desist and refrain, from:

- 1. For a period of one year from the date of this Final Judgment, operating or using any ALPR System to gather or interpret LPR Data except pursuant to a valid agreement with MVTrac; or
- 2. For a period of three years from the date of this Final Judgment, aggregating and/or storing LPR Data for resale to or use by third party repossession companies,

lenders, or LPR Providers for the purpose of recovering vehicles sought for recovery within the financial, lending or insurance industries or assisting in debt collection efforts on behalf of municipalities or government entities.

The court further ORDERS, ADJUDGES, and DECREES that all claims and causes of action asserted by any party to the above-captioned action against any other party be, and are hereby, dismissed without prejudice.

SIGNED March 28, 2016.

JOHA MCBRYDE //

Upited States District Judge